

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF ARKANSAS, CENTRAL DIVISION**

FRAZIER, *et al.*

Plaintiffs,

V.

GRAVES, *et al.*

Defendants.

Hon. Kristine G. Baker

Case No. 4:20-cv-434 (KGB)

JOINT MOTION TO STAY LIMITED DISCOVERY DEADLINE

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, the Court’s inherent authority, and Local Rule 7.2, Plaintiffs Darryl Hussey, Price Brown, Wesley Bray, Torris Richardson, Joseph Head, Lee Owens, Jimmy Little, Roderick Wesley, Marvin Kent, Michael Kouri, Jonathan Neeley, Alfred Nickson, Trinidad Serrato, Robert Stiggers, Victor Williams, and John Doe, individually and on behalf of all others similarly situated (collectively, “Plaintiffs”), and Defendants Solomon Graves, Dexter Payne, Benny Magness, Bobby Glover, Lee Watson, Tyrone Broomfield, John Felts, William (“Dubs”) Byers, and Whitney Gass, in their official capacities (the “ADC Defendants”), by and through undersigned counsel, jointly and respectfully move for an Order:

- (1) Staying the limited discovery deadline in the above-captioned case as it applies to the Plaintiffs and the ADC Defendants to allow the parties to continue negotiating a settlement agreement; and
- (2) Granting such other and further relief as the Court deems just and proper.

As set forth in the Joint Memorandum of Law, filed herewith, the Plaintiffs and ADC Defendants are engaged in good faith settlement negotiations and could benefit from some additional time to advance and finalize those negotiations without the press of an imminent discovery deadline. This Court should grant the joint motion to stay the limited discovery deadline because it would help facilitate settlement negotiations, conserve judicial resources, and permit the parties to seek a mutually agreeable resolution of this matter.

Dated: October 30, 2023

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Respectfully submitted,

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*Attorneys for Plaintiffs and the Putative
Classes*

CERTIFICATE OF SERVICE

I certify that on October 30, 2023, I filed the foregoing document electronically via the Court's CM/ECF system, which will send a copy to all counsel of record.

/s/ Christopher Kemmitt

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